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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

**NOTICE OF WITHDRAWAL OF DEBTORS' MOTION IN AID OF
ALTERNATIVE DISPUTE RESOLUTION PROCEDURES ORDER FOR
INDEMNIFICATION CLAIMS OF THE DEBTORS AGAINST MORTGAGE
LOAN SELLERS AS TO FREEDOM MORTGAGE CORPORATION**

PLEASE TAKE NOTICE that on October 22, 2015, Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator for the entities in the above referenced chapter 11 cases (the “Debtors”), filed a motion in aid of alternative dispute resolution procedures order for indemnification claims of the Debtors against mortgage loan sellers (the “Motion”) [Dkt. No. 51241].

PLEASE TAKE FURTHER NOTICE that on November 16, 2015, Freedom Mortgage Corporation (“Freedom”) filed an objection to the Motion (the “Objection”) [Dkt. No. 51462].

PLEASE TAKE FURTHER NOTICE that on December 1, 2015, the Court entered an Order granting the Motion, but adjourning the hearing date for the Motion as to certain parties

that filed a response or objection, including Freedom, until February 23, 2016 [Dkt. No. 51575].

The Motion was further adjourned as to certain parties, including Freedom.

PLEASE TAKE FURTHER NOTICE that LBHI is hereby withdrawing the Motion as to Freedom. This withdrawal shall only apply to Freedom, is without prejudice, and shall not have any force or effect as to any other entity subject to the Motion.

Dated: New York, New York

March 17, 2017

/s/ Adam M. Bialek

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